

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

JULIE BOULANGER,

Plaintiff,

v.

No. _____

MARRIOTT INTERNATIONAL, INC.,
A foreign corporation, and FARMINGTON
HOTEL ASSETS, LLC, a domestic limited
liability company, d/b/a COURTYARD BY
MARRIOTT, GALAXY HOTELS GROUP,
a foreign corporation,

Defendants.

COMPLAINT FOR PERSONAL INJURIES
AND LOST WAGES

COMES NOW the Plaintiff, Julie Boulanger, by and through her attorneys, Dathan Weems and Bridget Hazen, Dathan Weems Law Firm, LLC, and hereby states as follows:

1. Plaintiff is a resident of Palm Beach County, Florida.
2. Defendant, Marriott International, Inc., (hereinafter “Marriott”), is a foreign corporation authorized to do business and doing business in San Juan County, New Mexico.
3. At all material times, Defendant Farmington Hotel Assets, LLC was a domestic limited liability company, authorized to do business and did business in San Juan County, New Mexico, now dissolved.
4. Defendant Galaxy Hotels Group is the successor-in-interest to Defendant Farmington Hotel Assets.
5. Defendant Galaxy Hotel Group is a foreign corporation authorized to do business and doing business in San Juan County, New Mexico.

6. The amount in controversy in this case exceeds \$75,000.
7. This Court has diversity jurisdiction over this action pursuant to 28 U.S.C. § 1332, which provides for original jurisdiction over lawsuits where there is complete diversity of citizenship between the parties, and the amount in controversy, exclusive of interest and costs, exceeds \$75,000.
8. The acts and omission which are the subject of this lawsuit occurred in San Juan County, New Mexico.
9. On or about April 30, 2018, Plaintiff was a patron at the Courtyard Marriott, in Farmington, New Mexico.
10. On or about April 30, 2018, Defendants had a duty to keep the property safe for visitors.
11. Defendants breached their duty in the installation and maintenance of the flooring in the bathroom of their property which they knew or should have known was dangerously slippery when wet.
12. On or about April 30, 2018, Plaintiff, while attempting to enter the shower of her hotel room, slipped on the very slick bathroom floor and fell, suffering personal injuries.
13. As a direct and proximate result of the breach of duty by Defendants, Plaintiff suffered great bodily injury.
14. As a further direct and proximate result of the breach of duty by Defendants, Plaintiff suffered severe pain of body and mind, incurred expenses for necessary medical treatment, lost wages and was prevented from performing household duties.
15. Due to her injuries, Plaintiff will continue to suffer severe pain of body and mind, incur medical expenses, lost wages and be prevented from performing household services all in the future.

WHEREFORE, Plaintiff prays the Court for judgment against the Defendant in an amount to be decided by the trier of fact, for pre-judgment and post-judgment interest, reasonable costs and such other relief as the Court may deem just and proper.

Respectfully Submitted,

DATHAN WEEMS LAW FIRM, LLC

/s/ Bridget Hazen

Bridget Hazen

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Attorneys for Plaintiff